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32 HAMAMATSU PHOTONICS K.K., and
33 PHOTONICS MANAGEMENT CORP.

34 **UNITED STATES DISTRICT COURT**
35
NORTHERN DISTRICT OF CALIFORNIA

36 SEMICAPS PTE LTD.,
37 Plaintiff,
38 vs.
39 HAMAMATSU CORPORATION, et al.,
40 Defendants.

41 CASE NO. 17-cv-03440-DMR

42 **DEFENDANTS' UNOPPOSED MOTION**
43 **FOR ISSUANCE OF LETTER OF**
44 **REQUEST FOR INTERNATIONAL**
45 **JUDICIAL ASSISTANCE TO DEPOSE**
46 **AND REQUEST DOCUMENTS FROM**
47 **IPFA**

48 Date: Thursday, May 28, 2020
49 Time: 1:00 p.m.
50 Courtroom: 4
51 Judge: Honorable Donna M. Ryu

NOTICE OF MOTION AND MOTION

TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

3 NOTICE IS HEREBY GIVEN that on Thursday, May 28, 2020, at 1:00 p.m., or such other
4 time as ordered by the Court, located at 1301 Clay Street, Oakland, CA 94612, Defendants
5 Hamamatsu Corporation, Hamamatsu Photonics K.K., and Photonics Management Corp.
6 (collectively, “Hamamatsu”) will respectfully move to request that this Court sign and issue the
7 attached Letter of Request for International Judicial Assistance pursuant to the Hague Convention
8 of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters (“Letter of
9 Request”), attached hereto as Exhibit 1, in order to request the deposition and documents of the
10 International Symposium on the Physical and Failure Analysis of Integrated Circuits (“IPFA”).

11 The IPFA hosted the 13th International Symposium on the Physical and Failure Analysis of
12 Integrated Circuits on July 3-7, 2006 in Singapore. The article, *DC-Coupled Laser Induced*
13 *Detection System for Fault Localization in Microelectronic Failure Analysis* by Quah et al., was
14 published during the IPFA conference proceedings. The IPFA therefore possesses information
15 that is highly relevant to this lawsuit. The IPFA is located in Singapore and under the jurisdiction
16 of the Singapore courts, including the Supreme Court of Singapore. The evidence requested
17 cannot be obtained without the aid of the Supreme Court of Singapore. Hamamatsu respectfully
18 requests that the Court execute the attached Letter of Request at its earliest convenience.

19 Plaintiff SEMICAPS Pte Ltd. (“SEMICAPS”) has confirmed that it does not oppose this
20 request for issuance of a Letter of Request for International Judicial Assistance.

22 Dated: April 15, 2020

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

By: /s/ David Eiseman
David Eiseman

Attorneys for Defendants
HAMAMATSU CORPORATION,
HAMAMATSU PHOTONICS K.K., and
PHOTONICS MANAGEMENT CORP.

CERTIFICATE OF SERVICE

2 I, Joseph LeRoy, certify that pursuant to Local Rule 5-5, counsel of record who have
3 consented to electronic service are being served on April 15, 2020 with copies of the attached
4 document(s) via the Court's CM/ECF system, which will send notification of such filing to
5 counsel of record.

Executed on April 15, 2020, at San Francisco, California.

/s/ Joseph LeRoy